

DIANA L. WEISS
Law Office of Diana L. Weiss
1563 Solano Avenue Suite 223
Berkeley, CA 94707
Telephone: (510) 847-1012

Counsel for Defendant CRAWFORD

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR-12-00495 SBA
)	
Plaintiff,)	STIPULATED REQUEST TO CONTINUE
)	PLEA AND SENTENCING DATE TO
v.)	DECEMBER 11, 2012 AND TO
)	EXCLUDE TIME UNDER THE SPEEDY
)	TRIAL ACT AND ORDER
ANTHONY CRAWFORD II)	
)	
Defendant.)	
)	
)	

The above-captioned matter is set on November 6, 2012 before this Court for Change of Plea and Sentencing. The parties jointly request that the Court continue the matter to December 11, 2012, at 10:00 a.m., and that the Court exclude time under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), between the date of this Stipulation and December 11, 2012.

Anthony Crawford is charged in a two-counts of a twenty eight-count Indictment with Conspiracy to Posses with Intent to Distribute a Schedule I/II Controlled Substance (21 U.S.C. §§846 and 841(a)(1)) and Possession with Intent to Distribute Heroin and Cocaine with in 1000 Feet Of A School (21 U.S.C. §§ 841(a)(1),(b)(1)(C), and 860). Mr. Crawford has been in custody since the time of his arrest on June 29, 2012.

The parties have entered into a negotiated disposition of the charges pursuant to a written plea agreement under Federal Rule of Criminal Procedure 11(c)(1)(C). Mr. Crawford

1 has been interviewed by U.S. Probation and a draft Presentence Report has been prepared.

2 This matter was initially set for Change Of Plea and Sentencing on November 6, 2012.
3 On October 15, 2012, the parties received notice from this Court that the hearing date had been
4 continued to November 20, 2012.

5 Counsel for defendant Crawford is unavailable on November 20, 2012. Undersigned
6 defense counsel has a pre-planned, fully paid vacation scheduled and will be out of the district
7 from November 16 through November 25, 2012. The first available date that the court is
8 available is December 11, 2012.

9 For this reason, the parties agree that the failure to grant this continuance would deprive
10 defendant Crawford of continuity of counsel.

11 The parties further stipulate and agree that the ends of justice served by this continuance
12 outweigh the best interest of the public and the defendant in a speedy trial. Accordingly, the
13 parties agree that the period of time from the date of this stipulation until December 11, 2012
14 should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§
15 3161(h)(7)(A) and (B)(iv), for continuity of defense counsel.

16
17 DATED: October 23, 2012

/S/
JAMES MANN
Assistant United States Attorney

18
19 DATED: October 23, 2012

/S/
DIANA L. WEISS
Attorney for ANTHONY CRAWFORD

20
21 **ORDER**

22 Based on the reasons provided in the stipulation of the parties above, the Court hereby
23 finds:

24 1. Given that defense counsel will be out of district and unavailable on the date
25 currently set for Change of Plea and Sentencing;
26

1 2. Given that the ends of justice served by this continuance outweigh the best
2 interest of the public and the defendant in a speedy trial;

3 Based on these findings, IT IS HEREBY ORDERED that the Change of Plea and
4 Sentencing date of November 20, 2012 is vacated and reset for ***December 12, 2012***, at 3:00 p.m.
5 for Change of Plea and Sentencing. It is FURTHER ORDERED that time is excluded pursuant
6 to the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), from the date of this
7 Stipulation until December 12, 2012.

8
9 DATED: _10/23/12


Hon. SAUNDRA BROWN ARMSTRONG
Senior United States District Judge